

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF CORRESPONDENCE REGARDING THE ONE HUNDRED FIFTH  
OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF  
PUERTO RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT  
OF THE COMMONWEALTH OF PUERTO RICO TO INDIVIDUAL PROOF OF  
CLAIM NO. 32539.**

To the Honorable United States District Judge Laura Taylor Swain:

1. On December 12, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight”

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Board”), as the sole representative of the Commonwealth, HTA and ERS (collectively, the “Debtors”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> filed the *One Hundred Fifth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment or Services Provided* [ECF No. 9555] (the “One Hundred Fifth Omnibus Objection”) to various proofs of claim.

2. The One Hundred Fifth Omnibus Objection seeks to disallow certain deficient claims which purport to assert liabilities arising from salary or other compensation owed in connection with employment, pensions, or services provided by the claimant, but fail to provide critical information, such as the specific services provided, the salary accrued but unpaid, or other information needed to understand what liabilities any of the Commonwealth, HTA, ERS, or any other Title III Debtor may owe.

3. The Debtors have received the attached correspondence from Dorka Rodríguez Santiago (“Rodríguez Santiago”), a copy of which is attached hereto as Exhibit “A” (the “Rodríguez Santiago Response”), regarding Proof of Claim No. 32539 (the “Rodríguez Santiago Claim”). A certified translation of the Rodríguez Santiago Response is attached hereto as Exhibit “A-1”.

4. The Santiago Rodríguez Response consists of a copy of the Rodríguez Santiago claim. The Santiago Rodríguez Response does not, however, contain any additional information necessary to evaluate the Santiago Rodríguez Claim, such as an explanation of the basis for any liabilities owed to Santiago Rodríguez. Accordingly, the Debtors have determined that the

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Santiago Rodríguez Response still does not provide sufficient information to enable the Debtors to reconcile the Santiago Rodríguez Claim.

5. Accordingly, the Debtors respectfully request that the Court grant the One Hundred Fifth Omnibus Objection and disallow the Claim, notwithstanding the Santiago Rodríguez Response.

Dated: November 11, 2020  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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